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18 MARK HUNT

19
20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 MARK HUNT, an individual,
23
24 Plaintiff,
25 v.

26 ZUFFA, LLC d/b/a ULTIMATE
27 FIGHTING CHAMPIONSHIP, a
28 Nevada limited liability company;
BROCK LESNAR, an individual;
DANA WHITE, an individual; and
DOES 1-50, inclusive,
Defendants.

Case No.: 2:17-cv-00085-JAD-CWH

**STIPULATION AND [PROPOSED]
ORDER RE: EXTENSION OF TIME
TO FILE OPPOSITION TO MOTION
TO STAY
[FIRST REQUEST]**

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1 Pursuant to Local Rules IA 6-1, 6-2, and LR 7-1, Plaintiff MARK HUNT (“Hunt”),
2 and Defendants ZUFFA, LLC d/b/a ULTIMATE FIGHTING CHAMPIONSHIP
3 (“Zuffa”), DANA WHITE (“White”) and BROCK LESNAR (“Lesnar”) hereby stipulate
4 to extend the deadline for Hunt to file his Opposition to Zuffa and White’s Motion to Stay
5 Discovery [Doc. 47] until May 22, 2017. This is the first such stipulation seeking this
6 relief. This stipulation is based on the following:

7 Defendants’ respective Motions to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6)
8 [Docs. 11 and 30] and are set to be heard on May 15, 2017 [*See*, Docs. 13 and 46]. Zuffa
9 and White filed a Motion to Stay Discovery on April 20, 2017 [Doc. 47]. Lesnar joined in
10 the Motion to Stay Discovery on April 26, 2017 [Doc. 52].

11 Counsel for Hunt and counsel for Zuffa and White met and conferred regarding a
12 potential stipulation that may dispose of or limit the scope of the Motion to Stay
13 Discovery. Their meeting and conferring occurred via written correspondence on April
14 25 and April 27, 2017, and via telephone discussion on May 1, 2017. Counsel for Hunt
15 and counsel for Zuffa and White agreed that they would be in a better position to discuss a
16 potential stipulation that may dispose of or limit the scope of the Motion to Stay
17 Discovery following the May 15, 2017 hearing on the Motions to Dismiss. However,
18 pursuant to LR 7-2(b), Hunt’s opposition to the Motion to Stay Discovery is due by May
19 4, 2017. Therefore, the parties are requesting an extension of time for Hunt to file his
20 opposition to Zuffa and White’s Motion to Dismiss (joined by Lesnar) until May 22,
21 2017, one week following the hearing on Defendants’ Motions to Dismiss.

22 Good cause exists for this Court to extend the date for Hunt to file his opposition to
23 the Motion to Stay Discovery. No hearing date has been given for the Motion to Stay
24 Discovery. Moreover, the parties agree that they are more likely to have productive
25 discussions regarding a potential stipulation that may eliminate the need for or reduce the
26 scope of the Motion to Stay following the May 15, 2017 hearing on Defendants’ Motion
27 to Dismiss.

28 Based on the foregoing, the parties hereby stipulate and request that the Court issue

1 an Order extending the deadline for Hunt to file an opposition to Zuffa and White's
2 Motion to Stay Discovery until May 22, 2017.

3
4 DATED: May 2, 2017

HIGGS FLETCHER & MACK LLP

5 By: /s/ Christina M. Denning

6 CHRISTINA M. DENNING, ESQ.
7 SCOTT J. INGOLD, ESQ.
8 Attorneys for Plaintiff
9 MARK HUNT

10 DATED: May 2, 2017

CAMPBELL & WILLIAMS

11 By: /s/ J. Colby Williams

12 J. COLBY WILLIAMS, ESQ.
13 PHILIP R. ERWIN, ESQ.
14 Attorneys for Defendants ZUFFA, LLC
15 d/b/a ULTIMATE FIGHTING
16 CHAMPIONSHIP and DANA WHITE

17 DATED: May 2, 2017

CHRISTIANSEN LAW OFFICES

18 By: /s/ Kendeelee L. Works

19 PETER S. CHRISTIANSEN, ESQ.
20 KENDELEE L. WORKS, ESQ.
21 Attorneys for Defendants BROCK
22 LESNAR

23 IT IS SO ORDERED:

24 BY: 
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: May 4, 2017

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Barbara Lodovice
An employee of Higgs Fletcher & Mack LLP